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Lawyers for Innovators



August 12, 2020

Via Electronic Filing

Honorable George B. Daniels
United States District Judge
United States District Court, Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: *Busignani v. Ipsos-Asi, LLC*, Case No. 20-cv-03654-GBD
Request for Leave to File Document Under Seal**

Dear Judge Daniels:

This firm represents Plaintiff/Counterclaim Defendant Lana Busignani in the above captioned matter. This letter motion is written in accordance with Rule I(D)(ii) of Your Honor's Individual Practice Rules, Standing Order 19-MC-583, and Section 6 of the S.D.N.Y. Electronic Case Filing Rules and Instructions. By this letter motion, Ms. Busignani respectfully requests leave to file a document under seal. Specifically, she requests leave to file under seal the Employment Agreement referenced on pages 4-5 of Ms. Busignani's Memorandum of Law in Support of her Motion to Dismiss the Counterclaims. (Doc. No. 20).

On August 12, 2020, undersigned counsel conferred with counsel for Defendant/Counterclaim Plaintiff Ipsos-Insight, LLC (as successor-in-interest to Ipsos ASI, LLC) ("Ipsos") regarding the filing of the Ms. Busignani's Employment Agreement in connection with her motion to dismiss. Ipsos requested that the entire Employment Agreement be filed under seal, as Ipsos believes the Employment Agreement contains confidential and sensitive information that cannot be meaningfully redacted. Ms. Busignani does not want to violate her confidentiality obligations to Ipsos, and therefore seeks to comply with Ipsos's request.

Hon. George B. Daniels

August 12, 2020

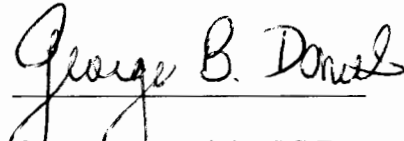
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A copy of the Employment Agreement is separately and contemporaneously being filed provisionally under seal via ECF.

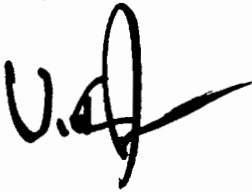
A proposed endorsement for the Court's consideration is below.

1. Good cause having been shown, Plaintiff/Counterclaim Defendant Lana Busignani is granted leave to file the Employment Agreement under seal.

SO ORDERED:


George B. Daniels U.S.D.J.

Very truly yours,



Vivek Jayaram, Esq.

Counsel for Plaintiff/Counter-Defendant

Lana Busignani